

ARW:tac

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 15-mj-978 HB

ABDIRIZAK MOHAMED WARSAME

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Beginning on or before March 1, 2014, and continuing until the present in the State and District of Minnesota, defendant(s)

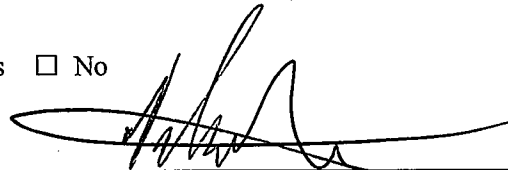
Conspired to provide material support to a designated foreign terrorist organization and provided material support to a designated foreign terrorist organization.

in violation of Title 18, United States Code, Section(s) 2339B.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

Vadym Vinetsky, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

12/9/15

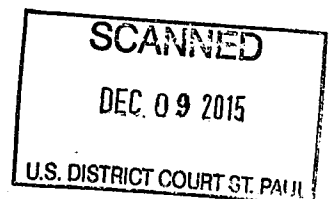
City and State: St. Paul, MN



Judge's Signature

Hildy Bowbeer, U.S. Magistrate Judge

Printed Name and Title



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
District Court File No. 15 -mj - 978 HB

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	AFFIDAVIT OF SPECIAL
)	AGENT VADYM VINETSKY
v.)	IN SUPPORT OF AN
)	APPLICATION FOR A
ABDIRIZAK MOHAMED WARSAME,)	CRIMINAL COMPLAINT
)	AND AN ARREST WARRANT
Defendant.)	

STATE OF MINNESOTA)	
)	SS:
COUNTY OF RAMSEY)	

I, Vadym Vinetsky, being duly sworn upon my oath, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (hereinafter the "FBI"), and have been employed by the FBI since approximately February of 2010. Since November of 2014, I have been assigned to the Joint Terrorism Task Force (hereinafter the "JTTF") of the FBI's Minneapolis Division. My duties as a Special Agent include, among other things, investigating criminal violations relating to terrorism, such as material support to designated foreign terrorist organizations. The statements contained in this affidavit are based on information I have learned through my own investigation; my background, training, and experience as an FBI Special Agent assigned to the JTTF; the investigation of other FBI Special Agents and law enforcement officers;

records and other evidence obtained during the course of this investigation; and discussions with individuals as set forth in this affidavit.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement personnel, and witnesses. This affidavit is intended to show merely that there is probable cause for this Court to issue the requested criminal complaint and arrest warrant. This affidavit does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that the defendant herein, **ABDIRIZAK MOHAMED WARSAME ("WARSAME")**, has committed violations of 18 U.S.C. § 2339B(a)(1) (providing, and conspiring to provide, material support, specifically personnel, to a designated foreign terrorist organization), as described in more detail below.

FACTS CONSTITUTING PROBABLE CAUSE

The Islamic State in Iraq and the Levant is a Designated Foreign Terrorist Organization

4. The Islamic State in Iraq and the Levant ("ISIL") is a designated Foreign Terrorist Organization. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

5. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham, the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa ash-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. Although the group has never called itself "al-Qa'ida in Iraq," this name has frequently been used to describe it throughout its history. In an audio recording publicly released on June 29, 2014, ISIL announced a formal change of ISIL's name to Islamic State. This terrorist organization will be referred to as "ISIL" for the balance of this affidavit.

Charges Related To The Conspiracy To Provide Material Support To ISIL.

6. Beginning no later than approximately April of 2014, several young men from Minnesota's Somali-American community began conspiring to travel to Syria to join, and fight with, ISIL. Nine of these men, not including **ABDIRIZAK WARSAME**, have so far been charged, either by complaint or indictment, as a result of the FBI's investigation into this conspiracy. Three of the nine have pleaded guilty, five are scheduled to start trial on a second superseding indictment on May 9, 2016, and one is in Syria.

Defendant ABDIRIZAK WARSAME Is a Member of the Conspiracy to Provide Material Support to ISIL

7. Your affiant knows that in the summer of 2013, H.A.M., a 19 year-old Somali-American male from Minneapolis, Minnesota, traveled to Canada to visit several of his cousins.¹ When H.A.M. returned to Minnesota in the fall of 2013, his friend ABDULLAHI YUSUF ("YUSUF")², noted that H.A.M. had become far more conservative.

8. YUSUF has informed investigators that in the early spring of 2014, H.A.M. disappeared. YUSUF looked for H.A.M., but was eventually told that H.A.M.'s passport was missing and that his mother had flown to Turkey to try and find her son and persuade him to return home to Minnesota. That same day defendant GULED ALI OMAR ("OMAR")³ picked up YUSUF and co-defendant ADNAN ABDIHAMID FARAH ("A. FARAH")⁴ and took them to a restaurant. OMAR and A. FARAH talked to YUSUF about fighting jihad overseas and afterwards, the three men went to a local mosque, where they played basketball and watched propaganda videos that glorified religious

¹ Investigators learned that three of those cousins later left Canada for Syria where they joined ISIL, and are believed to have been killed while fighting for the terrorist organization.

² On February 26, 2015, YUSUF appeared with counsel before Senior District Judge Michael J. Davis and pleaded guilty to one count of conspiring to provide material support and resources to a designated foreign terrorist organization (ISIL) in violation of 18 U.S.C. § 2339B(a)(1).

³ OMAR is charged in a second superseding indictment in Criminal File No. 15-49 (MJD/FLN) with various crimes related to the conspiracy to travel to Syria to join, and fight with, ISIL. He is scheduled to be tried together with his four co-defendants beginning on May 9, 2016.

⁴ A. FARAH is charged in a second superseding indictment in Criminal File No. 15-49 (MJD/FLN) with various crimes related to the conspiracy to travel to Syria to join, and fight with, ISIL. He is scheduled to be tried together with his four co-defendants beginning on May 9, 2016.

violence. A number of other men, including **WARSAME**, **ZACHARIA ABDURAHMAN** (“**ABDURAHMAN**”)⁵, **ABDI NUR**⁶, **A. FARAH**, **MOHAMED ABDIHAMID FARAH** (“**M. FARAH**”)⁷ and **ABDIRAHMAN YASIN DAUD** (“**DAUD**”)⁸ were present at the mosque that night, watching videos and playing basketball. **YUSUF** has told investigators that after this evening, and throughout the spring of 2014, he attended a number of meetings with these men – all of whom aspired to travel to Syria to join and fight with ISIL. At one such meeting during the spring of 2014, members of the group discussed ways to leave the United States and travel to Syria despite the fact that law enforcement’s scrutiny of them was intense. **WARSAME**, **OMAR** and others settled on a plan of going to Syria via Mexico. At another meeting of the group, **OMAR** was elected leader, or “emir” of the group. According to **YUSUF**, **WARSAME** participated in the meeting at which **OMAR** was elected emir.

9. Also during the spring of 2014, **WARSAME** and **OMAR** introduced **YUSUF** to co-conspirator **Y.J.**, a 21 year-old Minneapolis resident aspiring to travel to

⁵ On September 17, 2015, **ABDURAHMAN** appeared with counsel before Senior District Judge Michael J. Davis and pleaded guilty to one count of conspiring to provide material support and resources to a designated foreign terrorist organization (ISIL) in violation of 18 U.S.C. § 2339B(a)(1).

⁶ **NUR** departed from Minnesota on May 29, 2014, and traveled to Syria, where he joined ISIL. He has been charged by complaint with conspiring to provide material support and resources to a designated foreign terrorist organization (ISIL) in violation of 18 U.S.C. § 2339B.

⁷ **M. FARAH** is the brother of **A. FARAH**. He is charged in a second superseding indictment in Criminal File No. 15-49 (MJD/FLN) with various crimes related to the conspiracy to travel to Syria to join, and fight with, ISIL. He is scheduled to be tried together with his four co-defendants beginning on May 9, 2016.

⁸ **DAUD** is charged in a second superseding indictment in Criminal File No. 15-49 (MJD/FLN) with various crimes related to the conspiracy to travel to Syria to join, and fight with, ISIL. He is scheduled to be tried together with his four co-defendants beginning on May 9, 2016.

Syria to join ISIL. YUSUF learned that Y.J. had obtained a U.S. passport and had saved approximately \$5,000 for this purpose. OMAR, then planning his own imminent departure for Syria, appointed **WARSAME** to replace him as the emir for the remaining co-conspirators in Minnesota. As the new emir, **WARSAME** immediately encouraged those with passports and money to travel to Syria by the end of the upcoming summer. On May 24, 2015, OMAR, Y.J., and a third individual,⁹ attempted to drive to southern California, planning to cross into Mexico and then from Mexico travel onwards to Syria. This plan was thwarted by OMAR's family.¹⁰

10. YUSUF, A. FARAH, and ABDI NUR ("NUR"), in a conversation with OMAR, decided to obtain passports and fly out of a U.S. airport as these three co-conspirators were believed to not be under law enforcement scrutiny. In YUSUF's presence, **WARSAME** provided A. FARAH \$200 for A. FARAH's expedited passport application. After YUSUF obtained his own passport, he showed the document to others involved in the conspiracy, including **WARSAME**. The group, including **WARSAME**, then discussed YUSUF's ability to travel to Syria.

11. Records of the U.S. Department of State's Passport Office show that on April 16, 2014, **WARSAME** applied for a U.S. passport on an expedited basis. The passport officer was concerned because **WARSAME**'s written application stated that he

⁹ The third individual who attempted to leave for Syria on May 24, 2014, was a 19 year-old Somali male who would, as described later in this affidavit, begin to cooperate with the FBI in 2015.

¹⁰ After this attempt failed, Y.J. bought a Greyhound bus ticket to New York City and a plane ticket from New York to Istanbul. Y.J. left Minneapolis for New York by bus on June 8, 2014 and flew out of New York, bound for Istanbul, on June 9, 2014. Y.J. eventually reached Syria and joined ISIL and is believed to have been killed in August of 2014 while fighting for the terrorist organization.

needed a passport for a family trip to Britain that was planned for July; however, in the Passport Office, **WARSAME** stated that the family was going to Australia, not Britain, and **WARSAME** said he needed the passport soon – the same day if possible. **WARSAME**'s passport application was denied on the grounds of insufficient supporting documentation. While your affiant has learned that **WARSAME** later succeeded in obtaining a U.S. passport in August of 2014, your affiant assesses that the denial of his application in the spring of 2014 kept **WARSAME** from attempting to leave the U.S. for Syria in April or May of 2014.

12. YUSUF made reservations for a May 28, 2014 flight from Minneapolis – Saint Paul (“MSP”) to Istanbul, Turkey. In the days prior to his planned departure, YUSUF made several deposits of cash into a newly-opened checking account. According to YUSUF, **WARSAME** accompanied him to deposit a portion of these funds. Also, the day before YUSUF's attempted departure, **WARSAME** accompanied YUSUF, NUR, and M. FARAH to a public library where YUSUF printed out his itinerary from one of the library's publicly-available computer terminals. The four men then went to a nearby mall, where they shopped for items needed for travel to Syria. Video obtained from a department store at the mall near the library depicts **WARSAME**, YUSUF, NUR, and M. FARAH shopping together during the early evening hours of May 27, 2014. FBI surveillance personnel noted YUSUF, M. FARAH, and NUR together outside Minneapolis Community and Technical College earlier, on the afternoon of May 27, 2014.

13. On or about May 28, 2014, YUSUF attempted to travel to Istanbul, Turkey. YUSUF had planned to make contact with ISIL members in Istanbul and, with their help, cross the Turkish/Syrian border in order to join the terrorist organization. YUSUF was stopped at MSP, however, by FBI Agents who prevented YUSUF from boarding his flight.

14. On May 29, 2014, NUR left from MSP and flew to Istanbul, Turkey. One week later, on June 6, 2014, NUR phoned home to Minnesota and spoke to a family member. The caller ID feature captured the number from which NUR was calling. The number contained a prefix "90", indicating that this is a Turkish telephone number. On June 25, 2014, Y.J., whose own travel to Syria to join and fight with ISIL is described above in paragraph nine and footnote 10 of this affidavit, also phoned home to Minnesota from the same Turkish number.

15. YUSUF has informed investigators that following his failed attempt to leave and NUR's successful departure for Syria, the group of aspiring travelers met at a park in Minneapolis to discuss the status of the conspiracy. At this meeting, **WARSAME** and YUSUF both assured the group of co-conspirators that they had not provided any information to authorities investigating the matter.

16. A man who later became a cooperating human source ("CHS") for the FBI traveled to San Diego, California at the end of May, 2014. There, he awaited contact from Douglas McAuthor McCain, a former Minnesota and San Diego resident who had

successfully traveled to Syria and joined ISIL in 2014.¹¹ In June of 2014, while still waiting to hear from McCain, the future CHS was contacted by **WARSAME**, who asked him for contact information for ISIL member H.K., a cousin of the future CHS's. H.K. was a Canadian citizen who had succeeded in reaching Syria and joining ISIL. ISIL member H.K. is one of the Canadian cousins of H.A.M. mentioned in paragraph seven of this affidavit, above. The future CHS provided the requested contact information to **WARSAME**. Later, in an April 6, 2015, recorded conversation, co-conspirators MUSSE and ABDURAHMAN told the CHS that **WARSAME** had sought this contact information in order to pass it to Y.J. (who is discussed in paragraph nine and footnote 10, above). When Y.J. went to Turkey, according to ABDURAHMAN, "he didn't have the numbers;" "he didn't have nothing;" and so "[h]e called Abdirizak, bro." MUSSE then stated "Abdirizak gave him the numbers." The CHS then stated that **WARSAME** got the numbers¹² from him, the CHS, while the CHS was in San Diego. Although Y.J. reached Istanbul on or about June 9, 2014, he did not phone home from the same Turkish telephone number that NUR had earlier used until June 25, 2014. The fact that NUR and Y.J. both used this number, and that they phoned Minnesota to say good-bye to their families after being in Turkey for a while, can be explained by this Turkish number being an ISIL-controlled number. The 16-day gap between Y.J.'s June 9 arrival in Turkey and

¹¹ McCain was later killed fighting for ISIL. On or about August 24, 2014, the U.S. State Department's Bureau of Consular Affairs, Office of Overseas Citizen Services, informed McCain's next-of-kin of his likely death in Syria.

¹² The numbers the CHS gave to **WARSAME** were the numbers for the CHS's cousin, and were not the same as the Turkish phone number from which both NUR and Y.J. phoned home to Minnesota.

his June 25 phone call leads your affiant to infer that Y.J. experienced difficulty in contacting ISIL facilitators upon arrival in Turkey and that H.K.'s contact information would therefore have been helpful to Y.J.

17. In an April 9, 2015 recorded conversation, the subject of **WARSAME** seeking a telephone number for an ISIL contact came up again. In a tape-recorded conversation between A. FARAH and the CHS, A. FARAH, referring to **WARSAME**, stated **WARSAME** had been trying to obtain from OMAR "a number from one of the brothers." The CHS asked "oh, he's trying to go to Sham, right," to which A. FARAH replied "yeah."¹³

18. On November 6, 2014, OMAR attempted to fly from MSP to San Diego, California. OMAR came to the airport with only a single piece of carry-on, and carrying his passport. OMAR was not permitted to board his flight. In subsequent recorded conversations reviewed by your affiant, OMAR would tell others that this effort on November 6th was one of several by OMAR to leave the United States for Syria. At this same time, co-conspirators MUSSE, ABDURAHMAN, M. FARAH, and AHMED traveled by bus from Minneapolis to New York and, on November 8, 2014, attempted to board flights from John F. Kennedy International Airport (hereinafter "JFK") to various cities in southeastern Europe (Sofia, Bulgaria; Athens, Greece; and Istanbul, Turkey). Federal law enforcement officers at JFK denied boarding to the men. Three of the men returned to Minnesota by bus; ABDURAHMAN also left New York City on a bus, but

¹³ "Sham" is a word that is used to denote greater Syria, and is a word used by *ISIL*. One of the names under which *ISIL* was designated as a terrorist organization by the Secretary of State (see paragraphs four and five above) was the Islamic State of Iraq and al-Sham.

stopped in Chicago on November 9 and 10 before returning to Minneapolis on November 11, 2014. At the time, **WARSAME** was temporarily residing in Chicago with his father. Your affiant has reviewed phone records showing that **WARSAME** and **ABDURAHMAN**'s phones connected with each other on November 9, 10, 11, and 12, 2014.

19. In early 2015, **OMAR**, **DAUD**, **ABDURAHMAN**, **MUSSE**, **M. FARAH** and **A. FARAH** revived the idea of leaving the United States for Mexico, and then traveling onward to Syria from Mexico. Another participant in these conversations was the individual described in paragraph 16 above, who had agreed to cooperate with the FBI's investigation. Now a Confidential Human Source ("CHS"), he recorded numerous conversations he had with members of the conspiracy. **WARSAME**, while visiting from Chicago in early April of 2015, participated in several of these conversations and, as outlined below, actively encouraged **OMAR** to travel to Syria to join **ISIL**. **WARSAME** did not plan to join the Mexico group, because he was planning to travel with his family to East Africa, then either break free of his family and travel onwards to Syria, or, as indicated in paragraph 23 of this affidavit, below, wait in Somalia for a time when, he believed, **ISIL** would expand to Somalia.

20. As noted above, the CHS made tape-recordings of numerous conversations he had with members of the conspiracy between February and April of 2015. Transcripts of those conversations have been prepared and reviewed. Several transcript portions bear on **WARSAME**'s membership in this conspiracy, and the specific things he did and said

in furtherance of the conspiracy's criminal objectives. Those transcript portions are described in the following paragraphs.

21. In a recorded conversation with OMAR on March 3, 2015, OMAR described **WARSAME** as part of the group of men aspiring to travel to Syria to join ISIL:

"And even the first time remember they had Abdi Yare (NUR) and all of us and they made me emir. Even before that, me and Daud, we had a really bad encounter because he was always like trying to rush everybody, everything, you know. We had a bad experience with each other. So whenever me and Abdi Yare (NUR), and...Hanad (MUSSE), Abdullahi (YUSUF), and Yusuf (JAMA) and Zach (ABDURAHMAN) and A-Zak (WARSAME) and, uh, who else, A-Zak and (name of unindicted co-conspirator)... (unindicted co-conspirator) was trying to leave with us too. (unindicted co-conspirator), Mohamed Farah, Adnan, and then there was ten of us and they appointed me as emir, you know? Daud was, Abdi Yare (NUR) was always trying to bring Daud, ya know?"

22. In a tape-recorded conversation on April 2, 2015, **WARSAME** described to OMAR an earlier conversation he had with A. FARAH. It was that conversation with A. FARAH, according to **WARSAME**, that was critical to his decision to travel overseas to join ISIL. In the following excerpt "AW" is **WARSAME** and "GO" is OMAR:

AW: You know what Adnan (FARAH) said to me? He was like ... wallahi,¹⁴ if you leave [Somali language spoken here]. He said [Somali] ...and the good people will stay [UI] be tested and the people were fake [Somali]. He said if anything, it's good for them. Wallah, I never will forget that what he said, it was good for them. But that's when [UI] got my picture. Bro, my mom and family and stuff were out of the picture a long time ago. Wallah, I made that decision a long time ago.

GO: I did too, bro.

¹⁴ "Wallahi" means "I swear to Allah".

23. During this same recording, **WARSAME** can be heard telling OMAR and the CHS about the method by which “the mujahadeen”¹⁵ pray during *jihad*. He stated, “*I love how the praying is.*”

24. On April 2, 2015, **WARSAME** recounted a conversation he had with NUR, before NUR left the United States for Syria. In this exchange, **WARSAME** told OMAR and the CHS that he proposed to NUR that they rob people in order to finance their travel overseas to Syria. **WARSAME** explained that NUR rejected this idea, and suggested they rob the government instead. **WARSAME** then referred to NUR as “a genius.”

25. In this same conversation, **WARSAME**, aware of OMAR’s prior failed attempts to join ISIL, encouraged him to continue his efforts to travel overseas to join the terrorist organization. In the following excerpt, “AW” is **WARSAME**, “GO” is OMAR, and “CHS” is the FBI’s Cooperating Human Source, while “[UI]” means “unintelligible”:

AW: *Could it be maybe this time if you still go, maybe Allah will see you as somebody who is—keeps trying and will probably allow you to go? Did you ever think of that?*

GO: *I did wallah. That’s the plus. That’s was make...that was telling me this is the right thing to do. Because you’re trying to [UI].*

AW: *Wallahi, I guarantee you, wallah. [UI]. If you, if you go and it does not work out, wallahi I guarantee you soon you will try again. You will keep trying [Somali]. Why beca-it’s going to—you know-have you—you know people that play poker?*

AW: *So I mean-I think, wallah, you should try it, just be smart about it. Don’t be dumb. You know? And know that every move you make, every thought, every single step you take...cuz it’s like playing a game of chess, bro, one wo-thing you move you can be in danger, or you could win. And that everything—comes with its consequences. You’re not good at chess, [UI].*

¹⁵ One who is engaged in *jihad*, a holy war.

GO: *I am good at chess, bro.*
 AW: *[Somali for "Look"], that's not the point, though.*
 CHS: *No, you're not.*
 AW: *If you know chess, every move you make you can—you can lose or-or win or whatever.*
 GO: *I know. That's why I'm [UI]. I'm not good at chess. [UI].*
 CHS: *So why don't you just [UI].*
 GO: *[UI]*
 CHS: *So, where are we at?*
 AW: *—all about putting your trust in Allah —*
 CHS: *But that's what we have. Yeah [UI]?*
 AW: *Wallahi, Guled, if you make it — wallahi you will give a hundred and—a thousand people [UI] not only that but you will give them conviction that anybody can do it.*
 GO: *Wallah, I don't know. [UI].*
 AW: *You will be an inspiration.*

26. In a tape-recorded conversation on April 3, 2015, an exchange took place involving **WARSAME**, the CHS, M. FARAH, and DAUD. In this discussion, **WARSAME** discussed his plan to travel to Syria from Somalia, and noted that if, as anticipated, the terrorist organization *al Shabaab* pledged allegiance to *ISIL*, then he, **WARSAME**, might not need to travel to Syria, because *ISIL* would then be in Somalia. In the following excerpt, "MF" is M. FARAH, "AW" is **WARSAME**, and "AD" is DAUD. "[OV]" means "overlapping voices," and "[UI]" means "unintelligible":

MF: *I want to ask Miski,¹⁶ yo, when they gonna give bayah¹⁷, fear God ["fear God," was said in Somali]. I'm going to ask him soon.*
 AW: *[OV] Yo, yo, yo, that's—that's why I'm trying to stay there, bro.*
 MF: *Over there, ah?*

¹⁶ "Miski" is a nickname for Mohamed Abdullahi Hassan, who departed Minnesota on or about August 2, 2008 for Somalia, where he joined the foreign terrorist organization *al Shabaab*. He was indicted as defendant number six in District Court Criminal File Number 09-50 (JMR/SRN) and as of this writing remains a fugitive from justice.

¹⁷ "Bayah" means allegiance.

AW: *[OV] Yeah, if I can't get to the dawla [a shortened name for ISIS], the dawla's probably gonna come to me.*

MF: *I mean—*

MF: *[OV] [UI]*

MF: *The time, the time [said in Somali]. If you have an opportunity while you're over there ["while you're over there," said in Somali].*

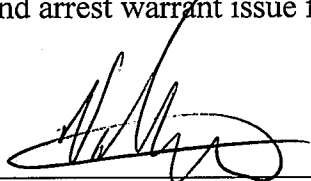
AW: *Ah, wallahi*

AD: *[OV] Go to Sham¹⁸, better get to Sham, bro.*

CONCLUSION

27. Your affiant respectfully submits that the foregoing establishes evidence amounting at least to probable cause to believe that **ABDIRIZAK MOHAMED WARSAME** has committed the crime of conspiring to provide material support to a designated foreign terrorist organization, namely *ISIL*. Your affiant therefore respectfully asks that the requested criminal complaint and arrest warrant issue from this Court.

Dated: 12/09/15


Vadym Vinetsky, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 4th day of December, 2015.


THE HONORABLE HILDY BOWBEER
United States Magistrate Judge

¹⁸ "Sham" is the historic name for greater Syria.